

AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. Appln. No. 09/688,711

REMARKS

Applicants thank the Examiner for acknowledging their claim to priority under 35 U.S.C. § 119, and receipt of a certified copy of the priority document.

The Examiner has objected to Figs. 1 and 2, asking Applicants to add a legend for prior art. Applicants have amended these figures accordingly.

The Abstract of the present application has been objected to for containing legal phraseology “means” in line 6 and “said” in lines 4, 5, 8 and 9. Applicants have deleted these words.

Claim 1 has been objected to for containing words “adapted to” in line 2 and for insufficient antecedent basis for the limitation “said specific requests” in line 5. Applicants have amended claim 1 to overcome these objections. The scope of claim 1 is not changed.

Claims 1-2 are all the claims pending in the application.

Claims 1 and 2 stand rejected under 35 U.S.C. 103(a) as being unpatentable over USP 6,108,341 to Christie in view of USP 6,560,327 to McConnell. Applicants respectfully disagree.

The Examiner has asserted that both Christie and McConnell disclose a system for communication control processing in telecommunications signaling according to the essential features of the claims. Applicants respectfully submit that this rejection is improper. If the Examiner thinks that both Christie and McConnell teach the limitations of the claims of the present invention, the ground of rejection should be 35 U.S.C. 102, instead of 35 U.S.C. 103. If the Examiner intends to reject the claims under 35 U.S.C. 103, he is supposed to read the limitations of the claims on the cited references, identify the limitation(s) missing from Christie

AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. Appln. No. 09/688,711

but supplied by McConnell, and provide the reasons for combining these references. However, the Examiner has failed to do these. As a result, Applicants cannot understand the Examiner's reasoning after a careful study of the Office Action and the cited references. To advance the prosecution of this application, Applicants distinguish the claims and the cited references as follows.

Claim 1 of the present application recites a telecommunications equipment including a service unit which communicates with one or more signaling networks and comprises a driver core and modules for processing specific requests, wherein the driver core includes sending means for sending the specific requests to the modules and processing means for processing generic requests.

For claim construction purposes, the description may act as a sort of dictionary, which explains the invention and may define terms used in the claims. *In re Vogel*, 422 F.2d 438, 441, 164 U.S.P.Q. 619, 621 (CCPA 1970). Here, Applicants state in the description that generic requests are requests common to various standards, and specific requests are requests specific to each standard (Specification, page 3, the second full paragraph). However, none of the cited references discusses generic requests or specific requests the same way as the claimed inventions.

Christie provides a system for telecommunication control processing, but Christie only teaches selecting a network characteristic in response to a first signal and generating a second signal reflecting the network characteristic. Christie does not teach or suggest the generic requests and specific requests recited in claim 1. Nor does Christie teach or suggest a driver core

AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. Appln. No. 09/688,711

comprising a means for sending specific requests to modules, and means for processing generic requests.

Specifically, as shown in Fig. 4 of Christie, a communication control processor (CCP) 450 comprises an interface 460, a translator 470, a processor 480 and a memory 490. The interface 460 accepts signals off of incoming links from other devices, such as switches, and service control points (SCP). The translator 470 is connected to the interface 460, and identifies a known field within a given signaling message, such as origination point code (OPC), destination point code (DPC) and circuit identification code (CIC) in an SS7 message. The translator 470 also replaces the OPC, DPC and CIC in the SS7 message and transfers the modified SS7 message to the interface 460 for transmission. The processor 480 accepts the signaling information from the translator 470 and selects network elements and/or connections that accomplish the communication control. The memory 490 is used by the processor 480 to store programming, information and tables (Christie, col. 14, lines 14-56). Thus, all signals in Christie are processed by the translator 470 and the processor 480. Accordingly, Christie fails to teach the specific requests, the generic requests, the means for sending specific requests, and the means for processing generic requests recited in claim 1 of the present application.

McConnell does not teach or suggest the generic requests or specific requests either. McConnell discloses a system for communicating with a second network controller in a second telecommunication network to provide telecommunications services in a first telecommunications network, using mediated service logic. As shown in Fig. 5 of McConnell, a SCP 102 includes a base service logic module 200, service logic modules 204, 206 and 208 for

AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. Appln. No. 09/688,711

three services, and a mediated service logic module 210. The base service logic module 200 invokes one of the service logic modules 204-208 according to the service requested (McConnell, col. 9, lines 7-9). The base service logic module 200 could also invoke the mediated service logic module 210 when a service provided by another SCP 104 is requested (McConnell, col. 9, lines 33-43). Thus, what the base service logic module 200 does is only invoking different service logic modules according to the service requested.

None of other cited references supplies the deficiencies of Christie and McConnell.

Accordingly, Applicants respectfully submit that claim 1 is patentable. Dependent claim 2 is patentable at least by virtue of its dependence on the patentable independent claim.

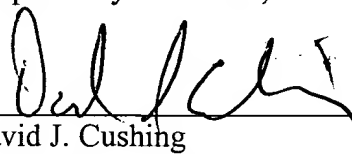
In the event that the Examiner continues to maintain the rejections, Applicants respectfully request the Examiner to provide proper ground of rejection, to read the claims on the cited references and to provide his line of reasoning without making the rejections final.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. Appln. No. 09/688,711

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,


David J. Cushing
Registration No. 28703

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON DC OFFICE

23373

CUSTOMER NUMBER

Date: April 30, 2004